



Wisconsin
Right to Life, Inc.

POLITICAL
ACTION
COMMITTEE

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REGISTRATION
FEDERAL ELECTION COMMISSION
COMMISIONER: RONALD L. HARRIS

JUL 7 1997 FEDERAL ELECTION COMMISSION

June 26, 1997

TO: Federal Election Commission
FROM: Susan Armacost, Assistant Treasurer
RE: 12 Day Pre-General Report (10/16/96-10/16/96)

Attached are the corrections and modifications for the 12 Day Pre-General Report outlined in your memo.

However, I do not find errors in the totals listed on lines 17, 19, and 20, Column B of the Detailed Summary Page. Please advise if I am incorrect.

Also, I believe we did fulfill all of the requirements for information on Schedule D. Again, please advise as to what information should have been provided that wasn't.

As you have requested, we will report contributions as you noted and we will be careful about putting down the correct identification number.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAY 28 1997

Alan Kramer, Treasurer
Wisconsin Right to Life
Political Action Committee
10625 W North Avenue
Milwaukee, WI 53226

Identification Number: C00173278

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

Dear Mr. Kramer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the total(s) for Line 21(c), Columns A and B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

-The totals listed on Lines 17, 19 and 20, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

↓
-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the full name and address of each creditor and purpose of each debt. 11 CFR §104.11

-Please amend your Schedule E to include memo entries to show the allocation of independent expenditures when the communication concerns more than one federal candidate. (see enclosure)

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00173278, to avoid potential errors in entering your reports onto the public record.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Neil A. Evans
Reports Analyst
Reports Analysis Division

Unlike other operating expenditures, taxes on an SSF's earnings are not payable by the connected organization. AO 1977-19.

7. Independent Expenditures

Schedule E

Itemize any independent expenditure which, by itself or when added to other independent expenditures made to the same payee during the same calendar year, exceeds \$200. Independent expenditures are itemized on Schedule E. A subtotal for itemized independent expenditures is entered on Line (e).

Independent expenditures of \$200 or less do not need to be itemized, though the committee must report the subtotal of those expenditures on Line (b).

104.3(b)(3)(vii)(C) and 104.4(a).

Enter the total of itemized and unitemized independent expenditures on Line (c) of Schedule E and on Line 24 of the Detailed Summary Page.

Certification

The treasurer must sign the statement on Schedule E which certifies, under penalty of perjury, that the expenditure meets the standards of "independence" (see Chapter 4 for more information). The form must be notarized.

104.3(b)(3)(vii)(B).

Last-Minute Independent Expenditure Notices

The SSF must file a special notice when it makes an independent expenditure of more than \$1,000 (by itself or aggregated with other independent expenditures made to the same payee) after the 20th day but more than 24 hours before the day of an election. The notice must be received by the filing office within 24 hours after the expenditure is made (see "Federal Filing" on page 28). The notice must include all the information required on Schedule E. (This reporting requirement applies to a written contract of more than \$1,000 which the committee has not yet paid.) 104.4(b) and 104.5(g).

INDEPENDENT EXPENDITURES

SCHEDULE E		ITEMIZED INDEPENDENT EXPENDITURES		
		Line 24 - Itemized Independent Expenditures		
Name of Committee (or PAC) National Organization PAC		\$00000000		
Address, Name, Address & ZIP Code of Each Payee	Method of Payment	Date Paid	Amount	Name of Federal Candidate Supported or Opposed by the Independent Expenditure
New City Post 101 21st Street City, State ZIP	Newspaper ad	8/22/94	\$2,536.80	Joseph Mitchell Senate, State <input checked="" type="checkbox"/> Known <input type="checkbox"/> Open
South City Post 1284 Broad Street City, State ZIP	Newspaper ad	8/23/94	\$8,681.18	Joseph Mitchell Senate, State <input checked="" type="checkbox"/> Known <input type="checkbox"/> Open
Roberts Communications 1818 16th Street City, State ZIP	Billboards	8/10/94	\$10,566.00	See allocation below <input type="checkbox"/> Known <input checked="" type="checkbox"/> Open
			\$8,277.50	William Franklin Senate, State <input checked="" type="checkbox"/> Known <input type="checkbox"/> Open
			\$8,277.50	Louis Stukier House, State <input checked="" type="checkbox"/> Known <input type="checkbox"/> Open
				<input checked="" type="checkbox"/> Known <input type="checkbox"/> Open
				<input type="checkbox"/> Known <input checked="" type="checkbox"/> Open
Total amount of itemized independent expenditures			18,731.88	
Subtotal of unitemized independent expenditures				18,731.88
Total independent expenditures				
I, [Signature], declare under penalty of perjury, that the independent expenditure reported above was made in connection with my campaign activities in the support or opposition of any candidate for my congressional district or state legislative district or election committee. I further declare that the expenditure did not exceed the Presidency of the United States, Governor, Lieutenant Governor, or member of a state or territorial legislature, or member of Congress, or a candidate for such office, in any election or campaign, or was not made by an association, committee, or organization in which I am a member or participant.				
<u>Tony Johnson</u>		10/10/94	Received and filed by [Signature] on [Date] October 10, 1994 My Commission Name 2/12/98 <u>Grade Humphrey</u> Notary Public	

Use memo entries to show the allocation of an independent expenditure when the contribution concerns more than one federal candidate.

The SSF must report the last-minute expenditure a second time on Schedule E, filed with its next regular report. 104.4(a).

8. Reporting Loans

Continuously itemize all loans received and made by the SSF until they are repaid. All repayments made or received on a loan must also be itemized.

104.3(a)(4)(iv); 104.3(b)(3)(ii) and (vi); 104.3(d); 104.11. Procedures for reporting loans and loan repayments are explained below.

Reminder: Loans are considered contributions to the extent of the outstanding balance of the loan. 100.7(a)(1)(i). Loans from banks, however, are not considered contributions if made in the ordinary course of business. Endorsements and guarantees of bank loans, however, do count as contributions. 100.7(a)(1)(i) and (b)(11).

Unlike other operating expenditures, taxes on an SSF's earnings are not payable by the connected organization. AO 1977-19.

7. Independent Expenditures

Schedule E

Itemize any independent expenditure which, by itself or when added to other independent expenditures made to the same payee during the same calendar year, exceeds \$200. Independent expenditures are itemized on Schedule E. A subtotal for itemized independent expenditures is entered on Line (a).

Independent expenditures of \$200 or less do not need to be itemized, though the committee must report the subtotal of those expenditures on Line (b).

104.3(b)(3)(vii)(C) and 104.4(a).

Enter the total of itemized and unitemized independent expenditures on Line (c) of Schedule E and on Line 24 of the Detailed Summary Page.

Certification

The treasurer must sign the statement on Schedule E which certifies, under penalty of perjury, that the expenditure meets the standards of "independence" (see Chapter 4 for more information). The form must be notarized. 104.3(b)(3)(vii)(B).

Last-Minute Independent Expenditure Notices

The SSF must file a special notice when it makes an independent expenditure of more than \$1,000 (by itself or aggregated with other independent expenditures made to the same payee) after the 20th day but more than 24 hours before the day of an election. The notice must be received by the filing office within 24 hours after the expenditure is made (see "Federal Filing" on page 28). The notice must include all the information required on Schedule E. (This reporting requirement applies to a written contract of more than \$1,000 which the committee has not yet paid.) 104.4(b) and 104.5(g).

INDEPENDENT EXPENDITURES

SCHEDULE E		ITEMIZED INDEPENDENT EXPENDITURES		Page <u>1</u> of <u>1</u> pages
		(See Page 24-25 for instructions)		
Name of Committee For National Organization PAC				COCP000001
For items, insert name of CANDIDATE in this space	Payee	Purpose of Expenditure	Date made or, if not made, date planned to make	Amount
New City Post 101 31st Street City, State ZIP	Newspaper ad		8/22/94	\$3,500.00 Joseph Mitchell Senate, State <input checked="" type="checkbox"/> Itemized <input type="checkbox"/> Unitemized
South City Post 1284 Broad Street City, State ZIP	Newspaper ad		8/23/94	\$5,881.18 Joseph Mitchell Senate, State <input checked="" type="checkbox"/> Itemized <input type="checkbox"/> Unitemized
Roberts Communications 1515 16th Street City, State ZIP	Billboards		8/10/94	\$10,565.00 See allocation below <input checked="" type="checkbox"/> Itemized <input type="checkbox"/> Unitemized
				\$6,277.60 William Franklin SENATE <input checked="" type="checkbox"/> Itemized <input type="checkbox"/> Unitemized
				\$6,277.60 Louise Staben HOUSE, State <input checked="" type="checkbox"/> Itemized <input type="checkbox"/> Unitemized
				<input checked="" type="checkbox"/> Report <input type="checkbox"/> Copy
SUBTOTAL of Itemized Expenditures				15,750.00
SUBTOTAL of Unitemized Expenditures				18,781.88
SUBTOTAL of All Expenditures				34,531.88
Under penalty of perjury, I certify that the independent expenditure reported above was made in accordance with the applicable provisions of the Federal Election Campaign Act and its regulations. This includes the reporting of contributions, expenditures, debts, and loans, and the disclosure of communications, publications, and other activities in connection with the election, campaign, or political party. I also certify that the committee, its agents, and its employees, are not agents				
<u>Tony Johnson</u>		10/10/94		Notarized and sworn to before me on the <u>10th</u> day of <u>October</u> , <u>1994</u> . My Commission expires: <u>8/12/95</u> <u>Brenda Humphrey</u> NOTARY PUBLIC

Use memo entries to show the allocation of an independent expenditure when the communication concerns more than one federal candidate.

The SSF must report the last-minute expenditure a second time on Schedule E, filed with its next regular report. 104.4(a).

8. Reporting Loans

Continuously itemize all loans received and made by the SSF until they are repaid. All repayments made or received on a loan must also be itemized.

104.3(a)(4)(iv); 104.3(b)(3)(III) and (vi); 104.3(d); 104.11. Procedures for reporting loans and loan repayments are explained below.

Reminder: Loans are considered contributions to the extent of the outstanding balance of the loan. 100.7(a)(1)(i). Loans from banks, however, are not considered contributions if made in the ordinary course of business. Endorsements and guarantees of bank loans, however, do count as contributions. 100.7(a)(1)(i) and (b)(11).

ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 2 Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)	I.D. No.			
Wisconsin Right to Life Political Action Committee	C0017328			
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (Month, Day, Year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Wisconsin Right-to-Life 10625 W. North Ave Milwaukee 53226	Payroll	10/9	549.37	SEE Allocation below
		10/16	\$116.28	<input type="checkbox"/> Support <input type="checkbox"/> Oppose
			\$138.80	David Prasser US House <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
			\$138.80	Jay Johnson US House <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
			\$138.80	Tom Reynolds US House <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
			\$138.80	Jerry Kiczka US House <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
			\$138.80	Jim Harsdorff US House <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures	\$ _____			
(b) SUBTOTAL of Unitemized Independent Expenditures	\$ _____			
(c) TOTAL Independent Expenditures	\$ _____			

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, association, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or reproduction in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of

_____, 19_____.

My Commission expires:

NOTARY PUBLIC

Signature

Date

ITEMIZED INDEPENDENT EXPENDITURES

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Class Review Guide for Instructional

Name of Committee or Full Wisconsin Right to Life Political Action Committee	I.D. No. C0017328			
Full Name, Mailing Address & ZIP Code of Each Recipient	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & other sought
			\$ 138.80	Ron Kind US House <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
			\$ 138.80	Mark Neumann US House <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
			\$ 138.80	Lynda Spottswood <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
			\$ 138.80	Scott West US House <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
			\$ 138.80	David Abele <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ 5	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ 3	
(c) TOTAL Independent Expenditures			\$ 166.50	

Under penalty of perjury, I certify that the independent expenditures referred herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the handling of dissemination, distribution, or reproduction in whole or in part of any campaign materials prepared by the candidate, his authorized committee, or their agents.

I received my new 10 before me this _____ day of

— 8 —

My Commitment to You

NOTARY PUBLIC

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Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/>	Postmark Illegible	
<input type="checkbox"/>	Received from the House Office of Records and Registration	DATE OF RECEIPT
<input type="checkbox"/>	Received from the Senate Office of Public Records	DATE OF RECEIPT
<input type="checkbox"/>	Other (Specify): <i>JmJ</i>	POSTMARKED and/or DATE OF RECEIPT <i>7-8-97</i>
PREPARED		DATE PREPARED